

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
INC., *et al.*,

Plaintiffs,

v.

CITY OF MYRTLE BEACH, *et al.*,

Defendants.


Civil Action No. 4:18-cv-00554-SAL

**DECLARATION OF KYLE
MCLEAN**

Kyle McLean makes the following statement:

1. I have been retained as an expert for the Defendant City of Myrtle Beach in the above lawsuit.
2. I am currently a professor of Criminology and Criminal Justice at Clemson University and have a Ph.D. in Criminology and Criminal Justice from the University of South Carolina.
3. Together with Geoff Alpert, I prepared a report analyzing thousands of calls for service in Myrtle Beach during peak tourist weekends. (ECF No. 94-1).
4. I have reviewed the supplemental documents provided by Defendant City of Myrtle Beach.
5. To update any existing analysis by adding the 2020 numbers provided in DEF01503843 would take no more than a day or two.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following is true and correct.



Kyle McLean, Ph.D.

October 12, 2020